

OAO91 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
000-007X
FILED

SOUTHERN

DISTRICT OF

TEXAS OCT 27 2014 28

UNITED STATES OF AMERICA

David J. Bradley, Clerk
Laredo Division

V.

CRIMINAL COMPLAINT

Celia GARCIA
Omaha, Nebraska

Case Number:

5:14mj1364

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about October 25, 2014 In Webb County, in the Southern District of Texas Defendant(s) did,

(Track Statutory Language of Offense)

knowingly, willfully and unlawfully imported from a place outside the United States of America, to wit, the United Mexican States to a place in the United States of America, to wit, Laredo, Texas, a controlled substance listed under Schedule II, of the Controlled Substance Act, to wit, approximately fifteen point sixty two (15.62) kilograms, gross weight, of heroin. In addition, the defendant did knowingly and unlawfully possess with the intent to distribute the above listed heroin. Furthermore, the defendant did knowingly and unlawfully conspire to import and possess with intent to distribute the above listed heroin.

in violation of Title 21 United States Code, Section(s) 841(a)(1), 846 and 952.

Special Agent,

I further state that I am a(n) Homeland Security Investigations and that this complaint is based on the following facts:

Official Title

following facts:

SEE ATTACHMENT A

Continued on the attached sheet and made a part of this complaint:

X Prisma K. Lopez No

Signature of Complainant

Prisma K. Lopez

Printed Name of Complainant

Sworn to before me and signed in my presence,

October 27, 2014

Date

at

Laredo, Texas

City and State

Diana Song-Quiroga, U. S. Magistrate Judge

Name and Title of Judicial Officer

Diana Song-Quiroga
Signature of Judicial Officer

Attachment "A"

I, Prisma K. Lopez, a Special Agent of the Homeland Security Investigations (HSI), have knowledge of the following facts:

1. On October 25, 2014, Celia GARCIA, a United States Citizen attempted to enter the United States via the Gateway to the Americas Bridge I in a 2004 Honda Odyssey displaying Ohio license plate number [REDACTED]
2. U.S. Customs and Border Protection (CBP) officers obtained a negative declaration from GARCIA. GARCIA stated to CBP officers that she was traveling from Jalisco, Mexico and heading to Ohio.
3. GARCIA was referred to secondary inspection. During the inspection, CBP officers discovered twenty three (23) cellophane wrapped packages containing a powdery substance that field tested positive for heroin. The 23 bundles had a gross weight of 15.62 kilograms and were concealed in non factory compartments located in the front fenders of the Odyssey.
4. HSI special agents responded to the seizure and read GARCIA her rights pursuant to Miranda in the Spanish language. GARCIA waived her rights in writing and agreed to answer questions without an attorney being present.
5. GARCIA stated that she was hired to cross the Odyssey into the U.S and drive it to Grand Island, Nebraska where she was to deliver the vehicle containing narcotics to unknown subjects.
6. Upon further questioning, GARCIA admitted that she knew there was heroin hidden in the vehicle.